

# EXHIBIT 2

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00473-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused Dell EMC SmartFabric OS10 ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area

since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, I understand that Dell employees working in Santa Clara, CA may report to superiors in Austin, Texas. For example, Stefan Bokaie (a Dell employee with knowledge of the Accused Products working in Santa Clara, California) reports to a manager located in Austin, Texas. I also understand that financial, sales, and marketing relating to the Accused Products are **managed** in Austin / Round Rock, Texas.

7. Aside from the employees located in the Austin Division, Dell has additional employees with knowledge of the Accused Products located in Santa Clara, California. Based on a review of records available to me, and (where needed) **after conferring with colleagues** with access to additional records, the following employees, located outside of the Western District of Texas, have responsibility relating to the Accused Products.

<b>Name</b>	<b>Title</b>	<b>Place of Business</b>
Stefan Bokaie	VP Product Development, Networking	Santa Clara, CA
Joseph White	Senior Distinguished Engineer	Santa Clara, CA

8. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020



Kellie Crantz  
Vice President, Human Resources  
Dell Technologies Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00474-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**



I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused Dell PowerConnect 5500 Series switches ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area

since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, I understand that financial, sales, and marketing relating to the Accused Products are **managed** in Austin / Round Rock, Texas.

7. Aside from the employees located in the Austin Division, Dell has additional employees with knowledge of the Accused Products located in Santa Clara, California. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located outside of the Western District of Texas, have responsibility relating to the Accused Products.

Name	Title	Place of Business
Joseph White	Senior Distinguished Engineer	<b>Santa Clara, CA</b>

8. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020

  
 Kellie Crantz  
 Vice President, Human Resources  
 Dell Technologies Inc.



**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00475-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused Dell Force 10 MXL switches ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area

since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, I understand that Dell employees working in Santa Clara, CA may report to superiors in Austin, Texas. For example, Stefan Bokaie (a Dell employee with knowledge of the Accused Products working in Santa Clara, California) reports to a manager located in Austin, Texas. I also understand that financial, sales, and marketing relating to the Accused Products are managed in Austin / Round Rock, Texas.

7. Aside from the employees located in the Austin Division, Dell has additional employees with knowledge of the Accused Products located in Santa Clara, California, and Chennai, India. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located outside of the Western District of Texas, have responsibility relating to the Accused Products.

Name	Title	Place of Business
Stefan Bokaie	VP Product Development, Networking	Santa Clara, CA
Rammohan Jagannathan	Director, Software Engineering	Chennai, India

8. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020



Kellie Crantz  
Vice President, Human Resources  
Dell Technologies Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00476-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**



I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused Networking switches, including but not limited to, PowerSwitch N Series switches ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area

since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after **conferring with colleagues with access to additional records**, I understand that Dell employees working in Santa Clara, CA may report to superiors in Austin, Texas. For example, Stefan Bokaie (a Dell employee working in Santa Clara, CA) reports to a manager located in Austin, Texas. I also understand that financial, sales, and marketing relating to the Accused Products are **managed** in Austin / Round Rock, Texas.

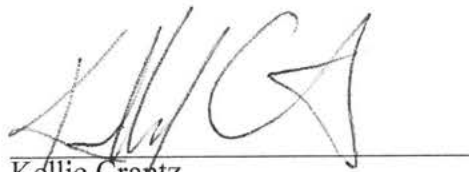
7. Aside from the employees located in the Austin Division, Dell has additional employees with knowledge of the Accused Products located in Santa Clara, California. Based on a review of records available to me, and (where needed) after **conferring with colleagues with access to additional records**, the following employees, located outside of the Western District of Texas, have responsibility relating to the Accused Products.

Name	Title	Place of Business
Stefan Bokaie	VP Product Development, Networking	<b>Santa Clara, CA</b>
Babuji Periasubbramaniam	Technical Staff, Software Engineering	<b>Santa Clara, CA</b>

8. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020

A handwritten signature in black ink, appearing to read 'Kellie Crantz', written over a horizontal line.

Kellie Crantz  
Vice President, Human Resources  
Dell Technologies Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00477-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused Dell PowerConnect 5500 Series switches ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area



since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, I understand that financial, sales, and marketing relating to the Accused Products are managed in Austin / Round Rock, Texas.

7. Aside from the employees located in the Austin Division, Dell has additional employees with knowledge of the Accused Products located in Chennai, India. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located outside of the Western District of Texas, have responsibility relating to the Accused Products.

Name	Title	Place of Business
Cynthiya Joseph	Software Principal Engineer	Chennai, India
Senthil Nathan Muthu	Software Senior Principal Engineer	Chennai, India

8. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020

  
Kelli Crantz  
Vice President, Human Resources  
Dell Technologies Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00478-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused Dell Networking devices running FTOS, including but not limited to the Dell Networking S3048-ON, Dell Networking S4048-ON, Dell Networking S4810-ON, Dell Networking S6000-ON, and E-Series, C-Series, N-Series, and S-Series hardware ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, I understand that Dell employees working in Santa Clara, CA may report to superiors in Austin, Texas. For example, Stefan Bokaie (a Dell employee with knowledge of the Accused Products working in Santa Clara, California) reports to a manager located in Austin, Texas. I also understand that financial, sales, and marketing relating to the Accused Products are managed in Austin / Round Rock, Texas.

7. Aside from the employees located in the Austin Division, Dell has additional employees with knowledge of the Accused Products located in Santa Clara, California, and Chennai, India. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located outside of the Western District of Texas, have responsibility relating to the Accused Products.

Name	Title	Place of Business
Stefan Bokaie	VP Product Development, Networking	Santa Clara, CA
James Mangin	Director, Network Development Engineering	Santa Clara, CA
Biju Jacob John	Director, Engineering	Chennai, India

8. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any



responsibilities related to the Accused Products.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020

  
Kellie Crantz  
Vice President, Human Resources  
Dell Technologies Inc.



**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00479-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused OpenManage Enterprise (OME) and OpenManage Network Manager (OMNM) ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area

since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located in the Austin Division have technical responsibilities relating to the Accused Products. I also understand that financial, sales, and marketing relating to the Accused Products are managed in Austin / Round Rock, Texas.

Name	Title	Place of Business
Jonathan Payne	Consultant, Product Management	Round Rock, TX

7. Aside from the employees located in the Austin Division, Dell has additional employees with knowledge of the Accused Products located in Santa Clara, California, Florida, and Panama City, Panama. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located outside of the Western District of Texas, have responsibility relating to the Accused Products.

Name	Title	Place of Business
Balaji Rajagopalan	Director, Software Engineering	Santa Clara, CA
Dionis Taveras	Senior Consultant, Product Management	Florida
Antono Castillo	Advisor, Commercial Contracts	Panama City, Panama

8. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have

determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020



Kellie Crantz  
Vice President, Human Resources  
Dell Technologies Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
EMC CORPORATION, AND VMWARE,  
INC.,

Defendants.

Case No. 6:20-cv-00480-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**



I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of VMware's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., EMC Corporation, and VMware, Inc. ("Defendants") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused devices incorporating VMware's VeloCloud solutions and SD-WAN software, such as Dell EMC SD-WAN Edge 600 series products ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located in the Austin Division have technical responsibilities relating to the Accused Products.

Name	Title	Place of Business
Atif Saeed	Product Manager	Austin, TX

7. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020

  
 Kellie Crantz  
 Vice President, Human Resources  
 Dell Technologies Inc.

**KELLIN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
EMC CORPORATION, AND VMWARE,  
INC.,

Defendants.

Case No. 6:20-cv-00481-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of VMware's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., EMC Corporation, and VMware, Inc. ("Defendants") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I further understand that WSOU has accused devices incorporating VMware's VeloCloud solutions and vSphere software, such as Dell's PowerEdge servers and VxRail appliances ("Accused Products") of infringement.



5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020



Kellie Grantz  
Vice President, Human Resources  
Dell Technologies Inc.



**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
AND EMC CORPORATION,

Defendants.

Case No. 6:20-cv-00482-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of Dell's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., and EMC Corporation ("Dell") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I also understand that WSOU has accused Edge Gateways ("Accused Products") of infringement.

5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area

since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located in the Austin Division have technical responsibilities relating to the Accused Products. I also understand that financial, sales, and marketing relating to the Accused Products are managed in Austin / Round Rock, Texas.

Name	Title	Place of Business
Michael Griffith	Technical Staff, Engineering Technologies	Round Rock, TX
Atif Saeed	Product Manager	Austin, TX

7. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020

  
 Kellie Crantz  
 Vice President, Human Resources  
 Dell Technologies Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
EMC CORPORATION, AND VMWARE,  
INC.,

Defendants.

Case No. 6:20-cv-00485-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

3. I submit this declaration in support of VMware's Motion for Intra-District Transfer of Venue to the Austin Division of the Western District of Texas in the above-captioned litigation. I understand that, in the litigation, Plaintiff WSOU Investments LLC d/b/a Brazos Licensing and Development ("WSOU") has accused Dell Technologies Inc., Dell Inc., EMC Corporation, and VMware, Inc. ("Defendants") of patent infringement and has filed the lawsuit in the Waco Division of the Western District of Texas. I also understand that the Waco Division of the Western Division of Texas includes the following counties in Texas: Bell, Bosque, Coryell, Falls, Freestone, Hamilton, Hill, Leon, Limestone, McLennan, Milam, Robertson, and Somervell. I also understand the Austin Division of the Western District of Texas includes the following counties in Texas: Bastrop, Blanco, Burleson, Burnet, Caldwell, Gillespie, Hays, Kimble, Lampasas, Lee, Llano, Mason, McCulloch, San Saba, Travis, Washington, and Williamson.

4. I further understand that WSOU has accused devices incorporating VMware's VeloCloud solutions and SD-WAN software, such as Dell EMC SD-WAN Edge 600 series products ("Accused Products") of infringement.



5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

6. Based on a review of records available to me, and (where needed) after conferring with colleagues with access to additional records, the following employees, located in the Austin Division have technical responsibilities relating to the Accused Products.

Name	Title	Place of Business
Atif Saeed	Product Manager	Austin, TX

7. Based on a review of records available to me, Dell does not maintain any place of business in the Waco Division of the Western District of Texas. Based on a review of records available to me and after conferring with colleagues with access to additional records, I have determined that Dell has no employees located in the Waco Division who have any responsibilities related to the Accused Products.

8. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020

  
 Kellie Crantz  
 Vice President, Human Resources  
 Dell Technologies Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

WSOU INVESTMENTS, LLC d/b/a BRAZOS  
LICENSING AND DEVELOPMENT,

Plaintiff,

v.

DELL TECHNOLOGIES INC., DELL INC.,  
EMC CORPORATION, AND VMWARE,  
INC.,

Defendants.

Case No. 6:20-cv-00486-ADA

**DECLARATION OF KELLIE CRANTZ IN SUPPORT OF  
DEFENDANTS' MOTION FOR INTRA-DISTRICT TRANSFER**

I, Kellie Crantz, declare as follows:

1. I am above 18 years of age and competent to make the following declarations. I have ascertained the facts set forth below based on my personal knowledge and on review of records available to me or my colleagues.

2. I currently serve as Vice President, Human Resources with Dell Technologies. My employer is EMC Corporation, a wholly owned subsidiary of Dell Inc., which in turn is wholly owned (indirectly) by Dell Technologies Inc. I support Dell Technologies' Infrastructure Solutions Group (ISG).

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5. Dell's worldwide headquarters is located in Round Rock, Texas. Dell also has significant operations in Austin, Texas. Dell has been located in the Round Rock/Austin area since its founding in 1984. Both cities are in the Austin Division. Dell currently employs over 14,000 people in the Austin Division. Dell is consistently among Austin's top-five largest employers.

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7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 4, 2020

  
Kellie Crantz  
Vice President, Human Resources  
Dell Technologies Inc.